

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Harrison Ross Byck, Esq.
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Bar ID: 026831988

In Re:
Christopher R. Jennings
Eileen Jennings
Debtors

Case No.: 16-31918-CMG
Chapter: 7
Hearing Date: February 13, 2018 10:00 a.m.
Judge: Gravelle

NOTICE OF MOTION TO REOPEN CASE

Christopher R. Jennings and Eileen Jennings have filed papers with the court requesting that an order be entered allowing their Attorney, Harrison Ross Byck, Esq. of Kasuri & Byck, L.L.C., to reopen the case for the limited purpose of filing an Amended Statement of Intention form “surrendering” the parties’ real property.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to grant this motion, or if you want the court to consider your views, you or your attorney must file with the clerk at the address listed below, a written response explaining your position no later than 7 days prior to the hearing date.

Hearing Date: February 13, 2018

Hearing Time: 10:00 a.m.

Hearing Location: 402 East State Street, Trenton, N.J. 08608

Courtroom: #3

File with the Court an answer, explaining your position at:

Clerk, U.S. Bankruptcy Court
Clarkson S. Fisher Federal Courthouse
402 East State Street
Trenton, NJ 08608

If you mail your response to the clerk for filing, you must mail it early enough so the court will receive it on or before 7 days prior to the hearing date.

You must also mail a copy of your response to:

Harrison Ross Byck, Esq.
Law Offices of Kasuri Byck, LLC 340 U.S. Highway 1 North
Edison, NJ 08817

If you, or your attorney, do not take the steps outlined above, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: 1/22/2018

/s/Harrison Ross Byck
Harrison Ross Byck

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CERTIFICATION OF HARRISON ROSS BYCK, ESQ.

Harrison Ross Byck, Esq., of full age, upon his oath herein certifies to the following:

1. I am an Attorney at Law admitted to practice in the state of New Jersey. I'm also admitted to practice before the Bar of this court. I am counsel to Christopher R. Jennings and Eileen Jennings, in this matter
2. I make this certification in support of a Motion to Reopen Case for my client's bankruptcy case, which was discharged on February 17, 2017. I have first- hand knowledge of the facts set forth herein.
3. The bankruptcy case was filed on November 15, 2016.

4. On March 9, 2017 the case was closed because the Order of Discharge was entered on February 17, 2017.

5. Through this motion, I request that the court reopen the case so the Debtors have the opportunity to Amend the Statement of Intentions to indicate they are “surrendering” the parties’ real property.

WHEREFORE, it is respectfully requested that this Court grants the Motion to Reopen the Case at this time to allow Debtor to amend the Statement of Intention form.

I hereby certify that the preceding statements made by me are true to the best of my knowledge. I understand that if any statement made by me is willfully false I am subject to punishment.

Date: 1/22/2018

/s/Harrison Ross Byck
Harrison Ross Byck

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STATEMENT AS TO WHY NO BRIEF IS NECESSARY

In accordance with D.N.J. LBR 9013-1(a)(3), it is respectfully submitted that no brief is necessary in the court's consideration of this motion, as it does not involve complex issues of law.

Date: 1/22/2018

/s/Harrison Ross Byck
Harrison Ross Byck

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ORDER GRANTING MOTION TO REOPEN CASE

The relief set forth on the following pages, numbered two (2) through (2) is **ORDERED**.

[Leave the rest of this page blank]

This matter having come before the Court upon the Motion of Christopher R. Jennings and Eileen Jennings (“Debtors”) for Entry of an Order reopening their Chapter 7 case for the limited purpose of Debtors being able to file an Amended Statement of Intention to indicate they are “surrendering” the parties’ real property (the “Motion”), and the notice of the Motion having been given and served by Debtors upon the Trustee and all necessary parties, and the Court having considered the Motion, and after due deliberation, and good and sufficient cause appearing therefore, it is hereby ORDERED:

1. The relief requested in the Motion is GRANTED.
2. Debtors shall be allowed to file an Amended Statement of Intention form to indicate they are “surrendering” the parties’ real property.